

TRP  
F. #2018R01809

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

MUSTAFA GOKLU,  
also known as "Mustangy,"  
Defendant.

----- X

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ OCT 07 2022 ★

BROOKLYN OFFICE

STIPULATION AND WAIVER OF JURY  
TRIAL AS TO FORFEITURE

19-CR-386 (S-1)(PKC)

Pursuant to Rules 23(a) and 32.2(b)(5)(A) of the Federal Rules of  
Criminal Procedure, the United States of America (the "Government") and the  
defendant Mustafa Goklu, (the "Defendant"), hereby agree to the following:

1. The Defendant voluntarily, freely, and without any mental reservations,  
waives any and all rights he may have under the laws of the United States or the Constitution  
of the United States to a jury trial on the Criminal Forfeiture Allegations charged in the  
above-captioned Superseding Indictment.

2. The Government and the Defendant agree that following the guilt  
phase of the criminal trial and only upon the Defendant's conviction of any of the offenses  
charged in the Superseding Indictment, the forfeitability of any assets of the Defendant shall  
be determined by the United States District Judge.

3. This waiver is binding on the Defendant, and the Defendant will not  
raise any defenses, file an appeal, or otherwise challenge any conviction, sentence, or

forfeiture imposed by the Court as concerning any right that they may have to a jury trial on the Criminal Forfeiture Allegations charged in the Superseding Indictment.

4. No promises, agreements, or conditions have been entered into by the parties concerning any right the Defendant may have to a jury trial on the Criminal Forfeiture Allegations other than those set forth in this agreement, and none will be entered into unless memorialized in writing and signed by all parties hereto.

5. To become effective, this waiver must be signed by all signatories and approved by the Court.

6. It is contemplated that this Stipulation and Waiver of Jury Trial may be executed in multiple counterparts with separate signature pages, with all such counterparts and signature pages together to be deemed one and the same original document.

Dated: Brooklyn, New York  
October 3, 2022

Respectfully submitted,

BREON PEACE  
United States Attorney  
Eastern District of New York

By: \_\_\_\_\_

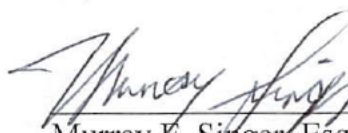
Gillian Kassner  
Marietou Diouf  
Assistant U.S. Attorneys  
(718) 254-6224/6263

AGREED AND CONSENTED TO BY:

10/3, 2022  
(date)

  
Mustafa Goklu  
Defendant

10/3, 2022  
(date)

  
Murray E. Singer, Esq.  
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(516) 378-8132  
Counsel to Defendant Mustafa Goklu


10/3, 2022  
(date)

  
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(347) 378-8132  
Counsel to Defendant Mustafa Goklu

Dated: Brooklyn, New York  
October 3, 2022

SO ORDERED AND APPROVED:

s/Hon. Pamela K. Chen

  
HONORABLE PAMELA K. CHEN  
UNITED STATES DISTRICT JUDGE  
EASTERN DISTRICT OF NEW YORK